

Eric A. Liepins
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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE	§	
	§	
ROYAL TRANSPORT EXPRESS, LLC	§	Case no.19-43230-11
	§	
	§	
	§	CHAPTER 11
DEBTOR	§	

RESPONSE TO MOTION TO LIFT STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Royal Transport Express, LLC. (“Debtor”) and files this its Response to Motion to Lift Stay and would show the Court the following:

1. The Debtor admits the allegations contained in paragraph 1 of the Motion.
2. The Debtor admits the allegations contained in paragraph 2 of the Motion.
3. The Debtor admits the allegations contained in paragraph 3 of the Motion.
4. The Debtor denies the allegations contained in paragraph 4 of the Motion.
5. The Debtor denies the allegations contained in paragraph 5 of the Motion.
6. The Debtor admits the allegations contained in paragraph 6 of the Motion.
7. The Debtor denies the allegations contained in paragraph 7 of the Motion.
8. The Debtor admits the allegations contained in paragraph 8 of the Motion.

9. The Debtor denies the allegations contained in paragraph 9 of the Motion.
10. The Debtor denies the allegations contained in paragraph 10 of the Motion.
11. The Debtor denies the allegations contained in paragraph 11 of the Motion.
12. The Debtor denies the allegations contained in paragraph 12 of the Motion.
13. The Debtor denies the allegations contained in paragraph 13 of the Motion.
14. The Debtor is willing to provide adequate protection as requested in paragraph 14 of the Motion.
15. The Debtor denies the allegations contained in paragraph 15 of the Motion.
16. The Debtor denies the allegations contained in paragraph 16 of the Motion.
17. The Debtor would show the collateral is necessary for the reorganization of the Debtor. The Debtor is willing to provide adequate protection in the form of monthly interest payments during the pendency of this case.

WHEREFORE ,PREMISES CONSIDERED, the Debtor requests this Court enter an Order denying the Motion and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

Eric A. Liepins
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By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via United States mail to Ammar Dadabhoy, 77 Suger Creek Center Blvd., Suite 401, Suger Land, Texas 77478 on this the 10th day of February 2020.

_____/s/ Eric Liepins_____
Eric A. Liepins